

# LaBonte Law Group

PLLC

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## VIA ECF

United States District Court  
Southern District of New York  
Denise Cote, U.S.D.J.  
500 Pearl Street, Room 1910  
New York, NY 10007

Re: Bayron-Paz v. Wells Fargo Bank, N.A., et al.  
Case No.: 1:22-cv-06122-DLC

Dear Judge Cote,

This firm represents defendant B&Z Auto Enterprises, LLC d/b/a Eastchester Chrysler Jeep Dodge ("ECJD"). On consent of all parties, ECJD moves for an extension of time to answer or otherwise respond to Plaintiff's first amended complaint to December 2, 2022. This is ECJD's first request for an extension.

In addition, on consent of all parties, ECJD also requests that the initial conference, currently scheduled for November 18, be adjourned to any of the following dates that are convenient for the Court: December 2, 9, or 16. The parties further request that the initial conference be held virtually.

Thank you for your courtesy and consideration of this matter.

*Granted. The conference is  
also moved to 12/2 at  
10<sup>00</sup> am*  
*Denise Cote*  
*11/15/22*

Respectfully submitted,

LaBONTE LAW GROUP, PLLC

BY: /s/ Scott H. Mandel  
Scott H. Mandel